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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No.: CR 03-0217 CRB
)	No.: CR 07-0445 CRB
Plaintiff,)	
)	<u>UNITED STATES' STATUS</u>
v.)	<u>MEMORANDUM</u>
)	
RANDY WRIGHT,)	
)	
Defendant.)	

The parties are next scheduled to appear before the Court on August 22, 2007 at 2:15 p.m. At that time, the government anticipates that the defendant will (1) plead guilty to the single charge in the Information in case number CR 07-0445 CRB, which charges her with possession of stolen mail, and (2) admit to a violation of the terms of her pretrial release in case number CR 03-0217 CRB.

The parties have agreed in principle to the terms of a plea agreement, which the government will provide by letter to the Court. The United States submits this Status Memorandum to advise the Court of its position regarding preparation of a presentence report in this matter.

In the proposed plea agreement, the defendant will agree to waiver her right to a presentence investigation under Federal Rule of Criminal Procedure 32(c). Even in the absence

1 of a presentence report, the United States believes that the Court will have sufficient information
2 to impose an appropriate sentence. The United States notes that a presentence report was
3 prepared with respect to the defendant in approximately May 2004. Thereafter, in June 2004, the
4 defendant was sentenced to a term of imprisonment of 34 months. She was released from BOP
5 custody in mid-2006. Upon her release from BOP custody, she was supervised by the Probation
6 Officer currently assigned to this matter, Jennifer James. Until Ms. Wright's failure to comply
7 with the terms of her supervised release, the Ms. James was in frequent contact with her.
8 Moreover, since her recent arrest and release to Restoration House, Ms. James has also been in
9 frequent contact with Ms. Wright. Accordingly, Ms. James is well equipped to provide the Court
10 with any additional information about Ms. Wright that the Court believes is necessary to make its
11 sentencing determination in this matter.

12 That being said, after entry of plea on August 22, 2007, it is the United States'
13 understanding that it will be the parties' joint request that the Court continue sentencing for a
14 modest period of time. This will permit the parties to effectively prepare for sentencing and will
15 give the defendant an additional opportunity to demonstrate to the Court her efforts and
16 willingness to comply with the terms of her supervised release.

17 DATED: August 21, 2007

Respectfully submitted,

18 SCOTT N. SCHOOLS
19 United States Attorney

20 /S/
21 KYLE F. WALDINGER
22 Assistant United States Attorney
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